

UNITED STATES DISTRICT COURT

for the

Southern District of Indiana

United States of America

v.

Cory Terry

Case No.

1:22-mj-0808

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 10, 2022 - August 31, 2022 in the county of Marion in the
Southern District of Indiana, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2251

Attempted Sexual Exploitation of Minor Victim 1

18 U.S.C. § 2251

Sexual Exploitation of Minor Victim 2

18 U.S.C. §2552A(a)(5)(B)

Possession of Child Pornography

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.

/s/ Andrew Willmann

Complainant's signature


Andrew Willmann, SA/ FBI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by
telephone (reliable electronic means)

Date: 9/12/2022City and state: Indianapolis, Indiana

Paul R. Cherry
 Paul R. Cherry
 United States Magistrate Judge
 Southern District of Indiana



AFFIDAVIT IN SUPPORT OF
AN APPLICATION AND ARREST WARRANT

I, Andrew D. Willmann, a Special Agent with the Federal Bureau of Investigation (“FBI”), being duly sworn, depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation, and have been since June 2014. I am currently assigned to the Indianapolis Field Office, Violent Crimes Against Children Task Force. As part of my official duties, I investigate crimes involving the sexual exploitation of minors, including criminal offenses pertaining to online enticement and the illegal production, distribution, receipt, and possession of child pornography. I have received training in the proper investigative techniques for violations pertaining to child pornography and child exploitation. I have conducted and assisted in numerous child exploitation investigations, to include undercover operations to identify and locate individuals who seek to engage in sexual activity with minors and have executed search warrants that have led to seizures of child pornography. I have also received training in computer systems, computer networks, and mobile devices. Moreover, I am a federal law enforcement officer who is engaged in enforcing criminal laws, including 18 U.S.C. §§ 2251 and 2252A, and I am authorized by law to request a complaint and arrest warrant.

2. **Requested Action:** This Affidavit is submitted in support of an application for a Criminal Complaint and Arrest Warrant for Cory Terry (**/**1997) for violations of: **Count 1:** Attempted Sexual Exploitation of Minor Victim 1, in violation of 18 U.S.C. § 2251, on or about April 10, 2022; **Counts 2 through 4:** Sexual Exploitation of Minor Victim 2, in violation of 18 U.S.C. § 2251, between on or about May 3, 2022 and July 8, 2022; and **Count 5:** Possession of Child Pornography, in violation of 18 U.S.C. § 2552A(a)(5)(B), on or about August 31, 2022.

3. The statements contained in this affidavit are based in part on information provided by U.S. federal law enforcement agents and state and local law enforcement officers; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcements officers; information gathered from the service of administrative subpoenas; the results of physical and electronic surveillance conducted by law enforcement agents; independent investigation and analysis by law enforcement agents/analysts and computer forensic professionals; and my experience, training and background as a Special Agent. Since this affidavit is being submitted for the limited purpose of securing a complaint and arrest warrant, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish that Cory Terry has violated Title 18, U.S.C. §§ 2251 and 2252A.

BACKGROUND OF INVESTIGATION

Terry's Exploitation of Minor Victim 1

4. On July 20, 2022, the Clinton Township, Michigan Police Department requested assistance from the FBI Detroit Division, Macomb County Resident Agency, with an investigation involving an adult male from Indiana who, using the social media application Discord, engaged in sexually explicit communications with a minor female (hereafter "MV1"). MV1 is an 11-year-old girl born in December 2010.

5. Investigators reviewed the information provided by Clinton Township Police Department, which included Discord chat messages obtained by search warrant, and observed sexually explicit conversations that occurred between April 9, 2022 and April 26, 2022 between username xxlehaltacoxx#**69 and MV1 (username villxch#16XX)(redacted, but known). Investigators learned that during the exchanges, the user xxlehaltacoxx#**69 coerced and induced MV1 to send sexually explicit material.

6. The following are some of the chat conversations I observed in the message logs obtained from Discord via search warrant between MV1 and the xxlethaltacoxx#**69 (Note: each message segment is read from the bottom up):

2022-04-15 03:30:57	xxlethaltacoxx#0069	No I don't mind
2022-04-15 03:30:46	villxch#1609	I understand if u don't feel comfortable being friends with me
2022-04-15 03:28:30	villxch#1609	I'm 11 like actually 11 but yea
2022-04-15 03:25:46	xxlethaltacoxx#0069	How old are you actually lol
2022-04-17 00:42:00	xxlethaltacoxx#0069	Have you started growing hair between your legs?
2022-04-17 00:41:46	villxch#1609	yea
2022-04-17 00:41:41	xxlethaltacoxx#0069	So are you a virgin?
2022-04-17 00:41:39	villxch#1609	I won't dw!
2022-04-17 00:41:29	xxlethaltacoxx#0069	If you do this time I'll just block you..... But okay â~ᑦᑦᑦ
2022-04-17 00:40:46	villxch#1609	dw
2022-04-17 00:40:45	villxch#1609	won't
2022-04-17 00:40:43	villxch#1609	nono I wony
2022-04-17 00:40:12	xxlethaltacoxx#0069	Are you sure? If not it's okay I don't want you to say yes then run tell your friends and everyone ðŸ
2022-04-17 00:39:39	villxch#1609	sure ig
2022-04-17 00:33:03	xxlethaltacoxx#0069	Can I ask you some inappropriate questions again? If you don't want to answer them it's okay â~ᑦᑦᑦ
2022-04-17 00:49:24	xxlethaltacoxx#0069	It's okay, have you sent your first nude yet?
2022-04-17 00:49:04	villxch#1609	idk how to answer that
2022-04-17 00:47:16	xxlethaltacoxx#0069	Do you want to feel a man's cock in your hands and in your holes?
2022-04-17 00:46:53	villxch#1609	yes sometimes
2022-04-17 00:46:53	xxlethaltacoxx#0069	It's okay
2022-04-17 00:46:47	villxch#1609	sorry if I don't answer quickly I'm watching YouTube at the same time while texting u
2022-04-17 00:45:47	xxlethaltacoxx#0069	Do you touch yourself?
2022-04-17 00:45:35	villxch#1609	sometimes
2022-04-17 00:43:47	xxlethaltacoxx#0069	Do you get horny?
2022-04-17 00:43:35	villxch#1609	yes
2022-04-17 00:4+D1	xxlethaltacoxx#0069	Is it hairy rn?
2022-04-17 01:06:51	villxch#1609	no
2022-04-17 01:06:22	xxlethaltacoxx#0069	Have you done anything sexual with your friends?
2022-04-17 01:05:55	xxlethaltacoxx#0069	I want you to feel how wet and needy you are babygirl
2022-04-17 01:05:23	villxch#1609	okay
2022-04-17 01:02:42	xxlethaltacoxx#0069	Rub your pussy for me rn babygirl
2022-04-17 01:02:22	villxch#1609	yes/
2022-04-17 01:01:00	xxlethaltacoxx#0069	Is your little pussy tingly thinking about it babygirl?
2022-04-17 01:00:20	villxch#1609	yes/
2022-04-17 00:58:54	xxlethaltacoxx#0069	Do you like watching girls touch their pussies like dirty little sluts for everyone to see? ðŸ™^ðŸŽµ
2022-04-17 00:58:18	villxch#1609	yes but I only watch girls on there not rlly men
2022-04-17 00:57:58	xxlethaltacoxx#0069	Do you touch your little pussy while watching it?
2022-04-17 00:57:45	villxch#1609	yes sometimes/
2022-04-17 00:57:34	xxlethaltacoxx#0069	Do you watch porn?

2022-04-17 01:21:34	xxlethaltacox#0069	When you are more comfortable you will let me look at you in your panties while I stroke my cock
2022-04-17 01:21:06	villxch#1609	no
2022-04-17 01:20:50	xxlethaltacox#0069	Was that so hard?
2022-04-17 01:19:49	xxlethaltacox#0069	That's a good first step
2022-04-17 01:19:34	xxlethaltacox#0069	Good girl ðŸ~Š I'm proud of you
2022-04-17 01:19:23	villxch#1609	ok u got it

2022-04-17 03:31:32	xxlethaltacox#0069	It's okay you did good ðŸ~Š
2022-04-17 03:31:19	villxch#1609	oh ok
2022-04-17 03:29:55	xxlethaltacox#0069	Lol I know it's your first time but it will become normal eventually
2022-04-17 03:29:37	villxch#1609	thanks
2022-04-17 03:29:26	xxlethaltacox#0069	I'm proud of you âœ“,ðŸ
2022-04-17 03:29:20	xxlethaltacox#0069	See that was easy ðŸ~ŠðŸ~ŠðŸ~ŠðŸ~ŠðŸ~Š
2022-04-17 03:27:35	xxlethaltacox#0069	
2022-04-17 03:27:25	xxlethaltacox#0069	I didn't even get to see
2022-04-17 03:25:20	xxlethaltacox#0069	
2022-04-17 03:25:00	xxlethaltacox#0069	Try for me?
2022-04-17 03:24:55	xxlethaltacox#0069	It will be a few seconds
2022-04-17 03:24:43	villxch#1609	becuase like I'm so tired
2022-04-17 03:23:52	xxlethaltacox#0069	Why not show me now

2022-04-17 20:44:59	villxch#1609	actually I don't rily wanna answer these questions rn maybe tonight
2022-04-17 20:44:29	xxlethaltacox#0069	Did you like showing me your hair down there last night ðŸ™^âœ“,ðŸ
2022-04-17 20:44:12	xxlethaltacox#0069	It's okay ðŸ~Š
2022-04-17 20:43:49	villxch#1609	if I don't answer quickly I'm watching youtube
2022-04-17 20:43:30	villxch#1609	sure
2022-04-17 20:43:28	villxch#1609	uhh
2022-04-17 20:41:32	xxlethaltacox#0069	Can I ask some more inappropriate things?

2022-04-18 15:19:00	villxch#1609	well later not rn my parents are kinda wondering around the house rn and I'm scared they're gonna
2022-04-18 15:18:30	xxlethaltacox#0069	Can you call and let me see more of your bush?
2022-04-18 15:18:04	villxch#1609	yea
2022-04-18 15:17:57	xxlethaltacox#0069	Are you in your room?

2022-04-19 01:05:47	villxch#1609	yea cuz I never dealt with this stuff before
2022-04-19 01:05:05	xxlethaltacox#0069	Lol so innocent
2022-04-19 01:00:28	villxch#1609	uhm ok
2022-04-19 00:45:30	xxlethaltacox#0069	Be a good girl and open your legs for me and lay back on me
2022-04-19 00:45:08	villxch#1609	oh that's uh nice
2022-04-19 00:42:47	xxlethaltacox#0069	I want to feel your bush rn and touch you down there

2022-04-23 04:56:56	xxlethaltacox#0069	If you keep doing things like this....I'll keep buying it or getting you more things
2022-04-23 04:56:31	villxch#1609	yea
2022-04-23 04:56:26	xxlethaltacox#0069	?*
2022-04-23 04:56:24	xxlethaltacox#0069	You there!
2022-04-23 04:48:24	xxlethaltacox#0069	đŸ~Š you deserve it for what you did baby
2022-04-23 04:47:12	villxch#1609	thank u sm!
2022-04-23 04:47:07	villxch#1609	oh ok
2022-04-23 04:47:02	xxlethaltacox#0069	I had to send it to you
2022-04-23 04:46:58	villxch#1609	I got it
2022-04-23 04:46:57	xxlethaltacox#0069	Oh there
2022-04-23 04:46:50	xxlethaltacox#0069	https://discord.gift/nDVkzAafH2Fcmccx
2022-04-23 04:46:32	xxlethaltacox#0069	Did you find it
2022-04-23 04:44:43	villxch#1609	I looked
2022-04-23 04:44:40	villxch#1609	dvwdfwdaf
2022-04-23 04:44:37	villxch#1609	
2022-04-23 04:42:03	xxlethaltacox#0069	Go look around discord
2022-04-23 04:41:49	villxch#1609	
2022-04-23 04:41:30	xxlethaltacox#0069	I gifted it to you
2022-04-23 04:41:24	xxlethaltacox#0069	ldk
2022-04-23 04:40:49	villxch#1609	how do I know if I got nitro or not
2022-04-23 04:40:41	xxlethaltacox#0069	Ok
2022-04-23 04:40:38	villxch#1609	I'll call u in a minn
2022-04-23 04:40:28	xxlethaltacox#0069	
2022-04-23 04:39:55	villxch#1609	wait how do I know if I have nitro or not

2022-04-25 05:59:29	xxlethaltacox#0069	Shut your mouth and let me see you in your panties rn
2022-04-25 05:59:12	villxch#1609	I'm scared to wake up my parents..
2022-04-25 05:58:25	xxlethaltacox#0069	You are going to show me what I want idc if you want to or not understand?
2022-04-25 05:58:02	xxlethaltacox#0069	This is what you deserve for treating me how you did and I bet you love this being told what to do
2022-04-25 05:57:33	xxlethaltacox#0069	Answer me with "yes sir" slut
2022-04-25 05:57:27	villxch#1609	I don't want to
2022-04-25 05:56:56	xxlethaltacox#0069	Show me what I want like a good little slut
2022-04-25 05:56:40	xxlethaltacox#0069	Good girl you know I want to see your little body
2022-04-25 05:56:25	villxch#1609	
2022-04-25 05:56:14	xxlethaltacox#0069	
2022-04-25 05:56:04	xxlethaltacox#0069	I am waiting slut if you keep taking this long I'll just make you take one for me
2022-04-25 05:54:16	xxlethaltacox#0069	Hurry up babygirl
2022-04-25 05:53:00	xxlethaltacox#0069	Let me see my little needy slut rn
2022-04-25 05:52:54	villxch#1609	ima send a old pic
2022-04-25 05:52:45	villxch#1609	finee
2022-04-25 05:52:34	xxlethaltacox#0069	Well? Answer Daddy babygirl
2022-04-25 05:51:31	xxlethaltacox#0069	Rn you will give me what I want do you understand?
2022-04-25 05:51:14	xxlethaltacox#0069	Do as you are told I am done asking
2022-04-25 05:51:02	villxch#1609	don't wanna show it rn
2022-04-25 05:50:58	villxch#1609	I uhh
2022-04-25 05:50:30	xxlethaltacox#0069	Let me jerk my cock to your little body like you deserve
2022-04-25 05:50:17	xxlethaltacox#0069	Let me see you rn slut

2022-04-25 06:13:34	xxlethaltacox#0069	Now
2022-04-25 06:13:32	xxlethaltacox#0069	Put headphones in and answer the call
2022-04-25 06:13:05	xxlethaltacox#0069	
2022-04-25 06:13:04	villxch#1609	I'm to scared
2022-04-25 06:13:00	villxch#1609	I just can't I'm sorry
2022-04-25 06:12:54	xxlethaltacox#0069	You had better let me see slut
2022-04-25 06:12:42	xxlethaltacox#0069	I'm stroking my throbbing cock waiting for this
2022-04-25 06:12:01	xxlethaltacox#0069	Well?!
2022-04-25 06:08:28	xxlethaltacox#0069	Stop typing and take the picture
2022-04-25 06:08:10	xxlethaltacox#0069	Dirty little horny slut
2022-04-25 06:07:56	xxlethaltacox#0069	Hurry!
2022-04-25 06:07:25	xxlethaltacox#0069	Show me your fucking panties now
2022-04-25 06:07:14	xxlethaltacox#0069	Do as you are told like the filthy little cock slut you are
2022-04-25 06:06:54	xxlethaltacox#0069	You don't get to say no
2022-04-25 06:06:48	xxlethaltacox#0069	No you aren't you are taking a picture
2022-04-25 06:06:40	villxch#1609	I'm sorry I can't I'm gonna wake my parents up I'm so sorry
2022-04-25 06:06:27	xxlethaltacox#0069	Send it
2022-04-25 06:06:02	xxlethaltacox#0069	It shouldn't take this long slut
2022-04-25 06:02:53	xxlethaltacox#0069	Good girl hurry up
2022-04-25 06:02:41	villxch#1609	let me take a picture
2022-04-25 06:02:16	xxlethaltacox#0069	Let me see you in your panties
2022-04-25 06:02:04	xxlethaltacox#0069	Good learn your place
2022-04-25 06:01:57	villxch#1609	yes sir
2022-04-25 06:01:53	xxlethaltacox#0069	Say yes Sir

2022-04-25 06:41:48	xxlethaltacox#0069	Do as I fucking tell you slut!!!
2022-04-25 06:41:35	villxch#1609	I'll text u tmr\
2022-04-25 06:41:31	villxch#1609	I can't talk anymore my parents just woke up again bye
2022-04-25 06:38:52	xxlethaltacox#0069	Stop wasting so much time
2022-04-25 06:38:46	xxlethaltacox#0069	Do it and you can sleep
2022-04-25 06:38:01	xxlethaltacox#0069	Or of your panties
2022-04-25 06:37:46	xxlethaltacox#0069	No has to have either your tits or a little bit of your bush in it
2022-04-25 06:37:24	villxch#1609	Do*
2022-04-25 06:37:21	villxch#1609	I really so not want to can I like send a pic of my legs or something
2022-04-25 06:35:55	xxlethaltacox#0069	Understand?
2022-04-25 06:35:51	xxlethaltacox#0069	Then I'll let you
2022-04-25 06:35:49	xxlethaltacox#0069	Not till you do this
2022-04-25 06:35:43	villxch#1609	I just wanna go to sleep
2022-04-25 06:35:16	xxlethaltacox#0069	I just want a tease pic not even a full one
2022-04-25 06:35:06	xxlethaltacox#0069	I want you to do what I tell you and take one you have been putting it off for too long
2022-04-25 06:34:43	xxlethaltacox#0069	No now you are wasting time

2022-04-25 17:52:00	villxch#1609	yea
2022-04-25 17:51:45	xxlethaltacox#0069	You sure? You act older sometimes
2022-04-25 17:51:17	villxch#1609	1's
2022-04-25 17:51:15	villxch#1609	two 1'd
2022-04-25 17:50:18	xxlethaltacox#0069	So be honest how old are you really

2022-04-26 06:02:30	xxlethaltacox#0069	Will you text me on here?
2022-04-26 05:41:02	xxlethaltacox#0069	You know you fucking want it don't you
2022-04-26 05:40:37	xxlethaltacox#0069	Now if you give me your attention I'll send more
2022-04-26 05:40:17	xxlethaltacox#0069	I want you looking like them
2022-04-26 05:39:02	xxlethaltacox#0069	I want you to take my big cock like the horny little whore you are
2022-04-26 05:38:38	xxlethaltacox#0069	I want to hold you down and fuck you so hard you whimper for me
2022-04-26 05:38:20	xxlethaltacox#0069	I've needed your little holes all day
2022-04-26 05:38:11	xxlethaltacox#0069	Are you ready to do what you promised me?
2022-04-26 16:03:35	xxlethaltacox#0069	You are so amazing baby you make me so freaking horny too
2022-04-26 16:02:10	villxch#1609	thanks
2022-04-26 16:02:00	xxlethaltacox#0069	I love your voice and your cute face
2022-04-26 16:01:49	xxlethaltacox#0069	You are so perfect to me
2022-04-26 16:01:44	xxlethaltacox#0069	Noone else baby
2022-04-26 16:01:35	xxlethaltacox#0069	This will be our secret
2022-04-26 16:01:28	xxlethaltacox#0069	Of course ðŸ™€
2022-04-26 16:01:27	villxch#1609	online
2022-04-26 16:01:23	villxch#1609	I'm just kinda insecure of myself that's why I don't let people see me online
2022-04-26 16:00:59	villxch#1609	thank u
2022-04-26 16:00:27	xxlethaltacox#0069	I'm really really proud of you!
2022-04-26 15:43:24	villxch#1609	I'm back
2022-04-26 15:43:17	xxlethaltacox#0069	<@947698485594054697>

7. Review of the Discord records also showed that the user xxlethaltacox#**69 sent Hentai anime pornography images to MV1. I reviewed the anime images sent by xxlethaltacox#**69 to MV1 in the above chat session and observed that they displayed cartoon drawings of older men engaging in sexual acts with young females.

8. On July 25, 2022, law enforcement completed a forensic extraction of MV1's Google Pixel cellular phone. Investigators reviewed the extraction and found a five second video, file name PXL_20220410_035836990.mp4, wherein MV1's vaginal area and face are displayed. According to the filename, the video was recorded on April 10, 2022.

9. Based on the foregoing as well as my review of the file ending in 6990, I believe that Terry attempted to sexually exploit MV1 in that he induced MV1 to produce the above-described video. **(Count 1)**

10. On August 3, 2022, a FBI Child Adolescent Forensic Interviewer interviewed MV1. MV1 admitted to engaging in chats, video calls, and voice calls with xxlethaltacox#**69

through Discord. MV1 stated that xxlethaltacoxx#**69 had asked MV1 inappropriate questions and wanted MV1 to send him a picture of her vagina. Law enforcement officers asked MV1 about the above-described video recovered from her phone. MV1 described it as a very quick video of a body part. MV1 recalled the video was recorded during either a voice call or video call with xxlethaltacoxx#**69.

11. Pursuant to the search warrant served on Discord by Clinton Township Police Department, Discord provided subscriber information for username xxlethaltacoxx#**69. I reviewed the information provided by Discord, which revealed the subscriber's phone number of 317-809-**** and email address of exteel4XXXX@gmail.com (known by redacted). The records also showed the most frequent login IP address to the account between April 9, 2022 and April 26, 2022 was 50.90.***.** (redacted but known).

12. On June 10, 2022, Clinton Township Police Department served a search warrant on Google for information pertaining to email address exteel4XXXX@gmail.com. On June 15, 2022, Google provided subscriber records pursuant to the search warrant. I reviewed the records provided by Google, which show the subscriber to the exteel4XXX@gmail.com account is Cory Terry, date of birth **/**/1997, phone number 317-809-**** (redacted but known).

13. An open-source Internet query for IP address 50.90.***.**, the most frequently used IP address during the time Terry was in communication with MV1, resolved to Charter Communications. On July 22, 2022, an FBI Administrative Subpoena was served on Charter Communications for information pertaining to the IP address. On July 26, 2022, Charter Communications provided records that showed the IP address was registered to an address at 1731 N. (redacted) Avenue, Indianapolis, Indiana (known, but redacted), which is located in the Southern District of Indiana.

14. On July 22, 2022, law enforcement served an FBI Administrative Subpoena on T-Mobile for information pertaining to the phone number provided by Discord and Google for Terry, 317-809-****. On July 25, 2022, T-Mobile provided records that showed the subscriber to the number was Cory Terry with a service and billing address at 1731 N. (redacted) Avenue, Indianapolis, Indiana (known, but redacted).

15. Pursuant to the above subpoena, T-Mobile also provided toll records for phone number 317-809-****. An analysis performed on the records provided by T-Mobile showed that Terry's phone number was in contact with MV1's phone number more than 140 times between April 26, 2022 and April 29, 2022.

16. A query of the Indiana Bureau of Motor Vehicles revealed a current operator's license for Cory Terry at 1731 N. (redacted) Avenue, Indianapolis, Indiana (known, but redacted).

17. Cory Terry had also registered a red Dodge Charger to 1731 N. (redacted) Avenue, Indianapolis, Indiana (known, but redacted) address.

18. Based on the above information and other information, law enforcement obtained a federal search warrant for Terry's residence at 1731 N. (redacted) Avenue, Indianapolis, Indiana (known, but redacted) from the Honorable Tim A. Baker or about August 29, 2022. The warrant was executed by Indianapolis FBI Agents on August 31, 2022.

Execution of the Warrant on Terry's Residence

19. During the execution of the search warrant on August 31, 2022, officers read Terry his Miranda rights, which he acknowledged orally and in writing, and waived. Terry's interview was audio and video recorded.

20. During the interview, Terry admitted that he had a Discord account with the username "xxlethaltacoxx."

21. The FBI seized a blue Motorola Android cell phone from Terry pursuant to the search warrant and Terry confirmed his phone number of 317-809-****.

22. Agents performed a cursory forensic review of Terry's Xbox at his residence, which showed that Terry's Xbox username was "xxlethaltacoxx" and the E-mail address associated with the account is "exteel4ever@gmail.com."

23. During his interview, Terry denied any contact with an 11-year-old on his Discord Account.

24. I have reviewed preliminary forensic results from devices located in Terry's bedroom and on his person during the August 31, 2022 search warrant execution. Agents recovered a Motorola Moto G Stylus 5G cellular telephone with IMEI number 356611287605707 from Terry's bedroom. The device contained communications with the Discord user "villxch#16XX". The device was also registered to the telephone number 317-809-****, which was also registered to the Discord account "xxlethaltacoxx##69."

Terry's Exploitation of Minor Victim 2

25. During the forensic review of the Motorola Moto G Stylus 5G cellular telephone, law enforcement officers discovered communications with and sexually explicit videos of a second minor victim. The minor victim (hereinafter MV2) is a female who is approximately 15 years old. MV2 has been identified and lives in Virginia. Her year of birth is 2007.

26. According to the forensic review of Terry's Motorola Moto G Stylus 5G cellular telephone, Terry used the social media application Snapchat to communicate with MV2. The username is known to me, but redacted because it identifies MV2 by her true name. The communications occurred between on or about March 19, 2022 and July 29, 2022.

27. According to the chat, Terry's Snapchat username was "ghostx80". During the search of Terry's residence, officers interviewed Terry's girlfriend (hereinafter Witness 1). Witness 1 told this affiant that Terry's Snapchat username was the word "ghost" with numbers at the end. The Snapchat account associated to the Motorola Moto G Stylus 5G cellular telephone located in Terry's bedroom was "ghostx80".

28. According to the forensic review, on or about May 28, 2022, Terry exchanged the following messages with MV2:

From: c16c39a1-d763-4d62-bd5a-8ea9bb6b4011 ghostx80 (owner)
 Timestamp: 5/28/2022 3:01:59 PM(UTC+0)
 Source App: Snapchat
 Body:
 Hi princess

 From: ae296d9c-dc61-4f27-8834-1452fc53c0a6 mya <3
 Timestamp: 5/28/2022 3:02:05 PM(UTC+0)
 Source App: Snapchat
 Body:
 hi daddy

 From: c16c39a1-d763-4d62-bd5a-8ea9bb6b4011 ghostx80 (owner)
 Timestamp: 5/28/2022 3:02:14 PM(UTC+0)
 Source App: Snapchat
 Body:
 How are you?

 From: ae296d9c-dc61-4f27-8834-1452fc53c0a6 mya <3
 Timestamp: 5/28/2022 3:02:14 PM(UTC+0)
 Source App: Snapchat
 Body:

 From: ae296d9c-dc61-4f27-8834-1452fc53c0a6 mya <3
 Timestamp: 5/28/2022 3:02:18 PM(UTC+0)
 Source App: Snapchat
 Body:
 i'm good hbu

 From: c16c39a1-d763-4d62-bd5a-8ea9bb6b4011 ghostx80 (owner)
 Timestamp: 5/28/2022 3:02:29 PM(UTC+0)

Source App: Snapchat

Body:

I'm good 😊

From: ae296d9c-dc61-4f27-8834-1452fc53c0a6 mya <3

Timestamp: 5/28/2022 3:02:41 PM(UTC+0)

Source App: Snapchat

Body:

i feel so pretty

From: c16c39a1-d763-4d62-bd5a-8ea9bb6b4011 ghostx80 (owner)

Timestamp: 5/28/2022 3:10:56 PM(UTC+0)

Source App: Snapchat

Body:

You are!

From: c16c39a1-d763-4d62-bd5a-8ea9bb6b4011 ghostx80 (owner)

Timestamp: 5/28/2022 3:11:00 PM(UTC+0)

Source App: Snapchat

Body:

You always are little one

From: c16c39a1-d763-4d62-bd5a-8ea9bb6b4011 ghostx80 (owner)

Timestamp: 5/28/2022 3:11:15 PM(UTC+0)

Source App: Snapchat

Body:

This is how I see you and want you to feel every time I look at you little one

From: ae296d9c-dc61-4f27-8834-1452fc53c0a6 mya <3

Timestamp: 5/28/2022 3:11:42 PM(UTC+0)

Source App: Snapchat

Body:

i love you so much daddy

From: c16c39a1-d763-4d62-bd5a-8ea9bb6b4011 ghostx80 (owner)

Timestamp: 5/28/2022 3:18:37 PM(UTC+0)

Source App: Snapchat

Body:

I love you more

From: ae296d9c-dc61-4f27-8834-1452fc53c0a6 mya <3

Timestamp: 5/28/2022 3:26:58 PM(UTC+0)

Source App: Snapchat

Body:

nope

From: ae296d9c-dc61-4f27-8834-1452fc53c0a6 mya <3
Timestamp: 5/28/2022 3:27:20 PM(UTC+0)
Source App: Snapchat
Body:

From: c16c39a1-d763-4d62-bd5a-8ea9bb6b4011 ghostx80 (owner)
Timestamp: 5/28/2022 3:28:19 PM(UTC+0)
Source App: Snapchat
Body:
Yes princess

From: c16c39a1-d763-4d62-bd5a-8ea9bb6b4011 ghostx80 (owner)
Timestamp: 5/28/2022 3:28:30 PM(UTC+0)
Source App: Snapchat
Body:
Little one do you want to help me cum?

29. On or about June 10, 2022, Terry exchanged the following messages with MV2:

From: c16c39a1-d763-4d62-bd5a-8ea9bb6b4011 ghostx80 (owner)
Timestamp: 6/10/2022 2:18:51 PM(UTC+0)
Source App: Snapchat
Body:
Did you show him your little needy pussy

From: ae296d9c-dc61-4f27-8834-1452fc53c0a6 mya <3
Timestamp: 6/10/2022 2:18:54 PM(UTC+0)
Source App: Snapchat
Body:
yes.

From: c16c39a1-d763-4d62-bd5a-8ea9bb6b4011 ghostx80 (owner)
Timestamp: 6/10/2022 2:19:07 PM(UTC+0)
Source App: Snapchat
Body:
You need to start sending those to me too then

From: ae296d9c-dc61-4f27-8834-1452fc53c0a6 mya <3
Timestamp: 6/10/2022 2:19:11 PM(UTC+0)
Source App: Snapchat
Body:
yes daddy

From: ae296d9c-dc61-4f27-8834-1452fc53c0a6 mya <3
Timestamp: 6/10/2022 2:19:12 PM(UTC+0)
Source App: Snapchat
Body:
just

From: ae296d9c-dc61-4f27-8834-1452fc53c0a6 mya <3

Timestamp: 6/10/2022 2:19:14 PM(UTC+0)
Source App: Snapchat
Body:
don't save em

From: ae296d9c-dc61-4f27-8834-1452fc53c0a6 mya <3
Timestamp: 6/10/2022 2:19:17 PM(UTC+0)
Source App: Snapchat
Body:
even in the chat

From: c16c39a1-d763-4d62-bd5a-8ea9bb6b4011 ghostx80 (owner)
Timestamp: 6/10/2022 2:19:37 PM(UTC+0)
Source App: Snapchat
Body:
From now on you will show me all of your little body whenever I need it like a good little slut

From: ae296d9c-dc61-4f27-8834-1452fc53c0a6 mya <3
Timestamp: 6/10/2022 2:19:43 PM(UTC+0)
Source App: Snapchat
Body:
yes daddy.

30. According to the forensic review of Terry's Motorola Moto G Stylus 5G cellular telephone, there were approximately nine videos stored in the "Screenrecord" folder. The nine videos appear to depict MV2 in various states of sexually explicit conduct or nudity. The videos appeared to be recordings of what was appearing on the screen of the phone in real time during the recording.

31. I have reviewed these videos and they constitute child pornography in that they depict a minor victim under the age of 18 engaged in sexually explicit conduct.

- a. One video file titled "screen-20220503-193656.mp4" lasted approximately fourteen minutes and thirty-two seconds. The video depicted MV2 lying on her back and fully nude. Decorative LED tube lighting is visible on the wall behind MV2 along with a large monogram letter "M". The focal point of the video is MV2's vagina and anus. MV2 appears to masturbate during the video. MV2's face is also visible at times during the video. She appears to have a gag placed in her mouth. **(Count 2)**

- b. A second video file titled “screen-20220708-034506.mp4” lasted approximately thirteen minutes and thirty-three seconds. The video depicted MV2 wearing a blue, purple, and black tie-dyed shirt. Decorative LED tube lighting is visible on the wall behind MV2. The focal point of the video is on MV2’s vagina. MV2 appears to remove her underwear and masturbate using a toothbrush during the video. MV2’s face is visible at times during the video. A small video is located in the top left corner of the video. The small video appears to show the top of a person’s head and hairline located in a bedroom matching Terry’s bedroom located at 1731 N. (redacted) Avenue, Indianapolis, Indiana. **(Count 3)**
- c. A third video file titled “screen-20220620-114733.mp4” lasted approximately fifteen minutes and fifty-six seconds. The video depicted MV2 wearing a tie-dyed sweatshirt and purple hair. Decorative LED tube lighting is visible on the wall behind MV2. During the video, MV2 removes her sweatshirt, shirt, bra, and underwear. MV2 appears to masturbate during the video. MV2’s face is throughout much of the video. Her vagina and breasts are clearly visible during the video. A small video is located in the corner of the video of MV2. The small video appears to show a window with curtains matching the bedroom belonging to Terry at 1731 N. (redacted) Avenue, Indianapolis, Indiana. **(Count 4)**

32. The videos described above appeared to have been recorded on separate days between on or about May 3, 2022 and July 8, 2022.

33. Based on the foregoing, Terry possessed images and videos of minors engaged in sexually explicit conduct on his Motorola Moto G Stylus 5G cellular telephone on or about August 31, 2022 **(Count 5)**.

34. **Interstate or foreign commerce:** Discord and Snapchat are social media applications that are facilities of interstate commerce. Terry's Motorola Moto G Stylus 5G cellular telephone was manufactured outside the State of Indiana.

CONCLUSION

35. Based on my training and experience, and the facts as set forth in this affidavit, there is probable cause in support of an application for a criminal complaint and arrest warrant for Cory Terry (**/**1997) for violations of: **Count 1:** Attempted Sexual Exploitation of MV1, in violation of 18 U.S.C. § 2251, on or about April 10, 2022; **Counts 2 through 4:** Sexual Exploitation of MV2, in violation of 18 U.S.C. § 2251, between on or about May 3, 2022 and July 8, 2022; and **Count 5:** Possession of Child Pornography, in violation of 18 U.S.C. § 2552A(a)(5)(B), on or about August 31, 2022.

/s Andrew Willmann

Andrew Willmann, Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Federal Rules of Criminal Procedure 4.1 by telephone.

Date: 9/12/2022

Paul R. Cherry
Paul R. Cherry
United States Magistrate Judge
Southern District of Indiana

